

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04749 (SMB)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC and Bernard L.  
Madoff,

Plaintiff,

v.

PHILIP F. PALMEDO,

Defendant.

**DECLARATION OF SEANNA R. BROWN IN FURTHER SUPPORT OF  
TRUSTEE'S MOTION FOR SUMMARY JUDGMENT**

I, Seanna R. Brown, declare the following:

1. I am a partner of the law firm of Baker & Hostetler LLP, counsel to Irving H. Picard, as trustee ("Trustee") for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act,

15 U.S.C. §§ 78aaa–III, and the chapter 7 estate of Bernard L. Madoff. I submit this Declaration in further support of the Trustee’s Motion for Summary Judgment.

2. Attached hereto as Exhibit 1 is a true and correct copy of the testimony of Bruce G. Dubinsky dated May 8, 2019 in *Picard v. Nelson*, Adv. Pro. Nos. 10-04658 (SMB), 10-04377 (SMB) (Bankr. S.D.N.Y. May 8, 2019).

3. Attached hereto as Exhibit 2 is a true and correct copy of an excerpt from the testimony of Frank DiPascali, Jr. dated December 4, 2013 during the multi-day criminal trial *United States v. Bonventre*, 10-CR-228 (LTS) (S.D.N.Y. Dec. 4, 2013), ECF No. 856.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing statements are true and correct.

Dated: October 23, 2020

Respectfully submitted,

BAKER & HOSTETLER LLP

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